

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

See Attach complaint

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

See Attached
complaint

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Amended
Complaint for a Civil Case

Case No. 4:19-cv-00492-TMC-TER
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

RECEIVED
USDC CLERK, FLORENCE, SC
2019 APR -3 AM 10:23

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

See
Attachments

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

See
Attachments

Defendant No. 2

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

Defendant No. 3

Name

Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

Defendant No. 4

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

See
Attachment

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1458 and 14 Amendment violations
S.C. Adult Protection Act violations
Neglect and abuse

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE ATTACH
PAPERS

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

To be chosen by Judge
what ever punitive money damages
or actual damages the Judge
thinks Im intitled to. Im unsure
im not a lawyer. Court order Investigation
and Preliminary Injunction

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4-1, 2019

Signature of Plaintiff

Printed Name of Plaintiff


Bruce Hudson

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

Bruce Hudson
Plaintiff
VS.

City of Columbia P.D.
Chief W.H.S. Holbrook
Officer Latisha Pitts
Investigator Lighthill
Investigator Frontner
Chief Sled Mark Keel
Attorney Gen. Alan Wilson
A.P.S. John Mezcham
Ombudsman Amy Hornsby
L.L.R. Mark Sanders
LT. Gov. Kevin Bryant
Public Defender Douglas Strickland
Public Defender Sarah Jarick
Head Solicitor April Sampson
Clerk of Court Janette McBride.
Defendants

CASE NO. 4:19-cv-00492-TMC-TJL

Amended
Complaint
Statement of Claim

Jury Trial
☒ YES ☐ NO

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This complaint is againsts the listed defendants for, 4 months of neglect and abuse, the abuse reached the level of 1,4,5,8 and 14 Amendment violations

The physical Abuse was done when defendants violated S.C Adult Protection Act

Plaintiff is a disable vulnerable human/protected class citizen due extra protection under the law, such extra protection is listed in S.C. Adult Protection Act

The Act gives a vulnerable citizen judicial cognizable intrest in prosecuting abusers and as a protected class citizen

gives them the right to criminal investigation by law enforcement

furthermore when defendants failed to enforce S.C Adult protection Act it made them guilty per the law of physical abuse them selfs and guilty of neglect of a vulnerable human.

43-35-10 (8) lists physical abuse as allowing a vulnerable citizen to be inflicted by abuse or failer to Act to protect such protected class citizen.

43-35-30 list requirements for law enforcement to take pictures "Photographing of abuse"

43-35 also lists each org "Defendants" that must investigate abuse claims, also lists people that are required to Report abuse "Defendants"

This Law makes a 3rd party's failer to report, investigate or Act to protect a vulnerable citizen as guilty as the actual person doing the abuse.

Everything my original abuser is guilty of, so to is the defendants in this case for not stopping such abuse! this includes 1458 and 14 Amendment violations

Defendants in this case per law had a legal obligation to protect the plaintiff and should have investigated and prosecuted abusers that were Employee by palmetto Richland hospital

By failing to do so per law they became the abusers them self

For this reason a 1983 civil Suits been filed for neglect, abuse and 1, 4, 5, 8 and 14 Amendment violation.

It was crule, 3 unusual punishment when law enforcement allowed a vulnerable human to be neglected abused and assaulted for 4 months Despite multiuble 911 calls and pleas for help, It also violated excessive force.

Case 3:18-cv-03188-TMC-TER and Case 3:19-cv-00491-TMC-TER both cases are deeply associated with this case

We have sued seperately becumes issues are diffrent

With this being said below is detail facts of this case.

CASE NO: 4:19-cv-00492-TMC-TER

Date 4-1-19
Page 4 of 12

The city of Columbia police Dept. is being sued because multiple law enforcement agents violated, S.C Adult Protection Act, Americans with disabilities Act, My 1st Amendment Right, 5th Amendment Right, 8th Amendment Right, and 14th Amendment Right all the above Acts or Rights was violated with disability based discrimination, both named and unnamed/unknown officers violated my rights From Feb - June 2017. Some officers refused to investigate while others tried to cover up felony crimes done against me a vulnerable Adult.

The Chief of Police W.H. Skip Holbrook is being sued because he is over city of Columbia police Dept and its officers that failed to protect me, despite multiple 911 calls, multiple complaints, and physical evidence of neglect and abuse, and failed to investigate or document any of the abuse.

For almost 4 months the police Dept was aware of caregivers neglect abuse and assault, yet failed to enforce laws of S.C. Adult Protection Act and failed to protect the plaintiff there for allowing care givers to continue to abuse the plaintiff. worst

CASE NO. 4:19-cv-00492-TMC-TER

Date 4-1-19
page 5 of 12

each time the plaintiff tried to report abuse and police failed to Act accordance to the law the plaintiff suffered more extreme abuse. one time after calling 911 to report neglect the plaintiff was neglected, abuse, threaten and punished for about a month.

Worst after neglect, abuse and assaulted ended, plaintiff continued to seek justice with city of columbia police Dept. Evidence was forwarded including video footage of plaintiff being attacked while in bed, eyewitness statements, Text messages from Nurse Admitting abuse & Assault. and medical records showing neglect and assault yet nothing was done.

When S.C.D.C. started a investigation the city of columbia police Dept. made false Allegations in order to Stop investigators from investigating into this matter, this was done to cover up the crimes.

CASE NO: 4:19-cv-00492-TMC-TER

DATE 4-7-19
PAGE 6 OF 12

I have evidence the city of Columbia police dept. and its officers knew

1) my caregivers did commit crimes of neglect, abuse and assault against me a vulnerable human to enforce disciplinary actions which violated my 8th and 14th Amendment Rights while also violating every section of 43-35-1 of S.C. Adult protection Act and Americans with Disabilities Act.

2) The Disciplinary Actions enforced by neglect, abuse and assault were done with disability based discrimination, because disciplinary actions was used to correct both hereditary mental health issues and my recovery mental health issues that developed from being a victim of violent crimes and left me with P.T.S.D.! Such disciplinary actions was enforced despite the fact that

- 1) Disciplinary actions didn't correct issues
- 2) Disciplinary actions made issues worse
- 3) I was unable to do what they wanted because of disabilities, no matter how excessive disciplinary actions was.

this violated Section 43-3510-(8) which states that abuse is using physically intrusive procedures to control

CASE NO. 4:19-cv-00492-TMC-JER

Date 4-1-19
Page 7 of 12

behavior for the purpose of punishments

3) The Type of disciplinary actions taken placed restrictions on my 1st Amendment Rights including freedom to associate because they refused to allow me visitors as a punishment and freedom of speech because they restricted/banned the use of a phone as a punishment and freedom of press because they refused to allow me to send or get mail, watch TV or go on websites, media social networks etc.

4) Disciplinary Actions placed restriction of my 5th Amendment right by violating due process

1) I was never charged with any wrong doing but was punished for months

2) I never got a court hearing or fair trial on what I was punished for

3) there was no grievance or appeal process I could use to correct or complain

4) No lawyer or judge involvement

5) All punishments were extreme and excessive lasting for months

6) punishments made me a prisoner and isolated me with

CASE NO. 4:19-cv-00492-TMC-TER

Date 4-1-19
Page 8 of 12

In the hospital, worst army protest againsts punishment was called a disturbance and was quickly put down with force! Neglect, Abuse, threats of Intimidation and assault was all used with Isolation, Restrictions and confinement of my room,

NONE of this however could have been done without law Enforcements refusal to enforce S.C. Adult protection Act and failure to protect a disable patient.

43-35-10-(8) states
"abuse is failing to act or protect a vulnerable human from neglect, abuse or assault"

There for every officer should be charged with abuse on a disable vulnerable human that caused extreme mental and physical injury on the plaintiff and violated many of his human and citizen Rights

CASE NO. 4:19-cv-00492-TMC-TER

Date 7-1-18
Page 9 of 12

Columbia Police Dept officer Latisha S. Pitts is being sued because on June 11 2017 she responded to a 911 call of disturbance and found a vulnerable bedridden human on the Floor Bleeding, Bruised, crying, Irs snatched out of his arm as her body CAM should have recorded. I the vulnerable Adult reported neglect abuse and assault but was ignored.

1) she refused to protect me or place me in protective custody as I requested, she refused to investigate any allegations made by me and instead side with the abusers, refused me the right to file a complaint or police report

2) she failed to take pictures or report incident to STEP as Section 43-35-30 "photographing of visible trauma" orders her to do

3) she made attempts to cover up crimes by instead charging a bedridden vulnerable human with assault, note this trumped up charge was thrown out of court by a judge.

I've requested internal affairs

of columbia police dept and the
inspector general to investigate
her misconduct. worst of
all she left me there were
abuse and assault could continue.

Note: many all calls was done
and multiple law enforcers failed
to protect me, many I never got
there names.

Investigator light Hill, was
contacted by columbia police service
for S.C.D.C investigating there
own officers misconduct.

MR. lighthill gave false info
to the investigating officer, that
made them stop investigations.

This was done to cover up
crimes. I have evidence
that he lied and got the
investigation stopped, for this
reasons hes being sued.

Investigator Eganter: was
contacted by multiple eye
witnesses that mailed medical
records, video footage, and
other evidence but he
refused to press charges
stating its to late.

CASE NO 4:19-cv-00492-TMC-VER

Date 4-1-19
Page 11 of 12

The Attorney General "Alan Wilson"
Chief of SLED "Mark Keel" ombudsman
office Director "Amy Hornsby" LLR "Mark Sanders"
LT Governor Office of Aging "Kevin Bryant"
D.S.S Director 'Adult Protective Services':
Joan Meacham
all 6 are being sued and there offices
because they are listed as investigative
entites in S.C. Adult Protection Act
43-35-10 (s) and all failed to enforce
laws, investigate Allegation / complaint and
refused to protect a vulnerable human
43-35-5 lists All duties and procedures
43-35-40 lists powers of each entite

I have evidence each org.
was told of the neglect, abuse
and assault but failed to
investigate.

Also The clerk of court: Jeanett McBride
the Head solicitor: April Sampson
the Head Public Defender: Douglas Strickland
and Public Defender Sarah Jarrett

All 4 of Richland General sessions
court is being sued for failing
to Report crimes of abuse on
a vulnerable Adult and failing
to investigate the matter, then
failed in there duty to protect the people

This complaint was file by
friends of the plaintiff and
mailed off by hospice inmates
that have worked with plaintiff
family / friends

Because of plaintiff
disabilities hes unable to
do his own legal work
as exhibits will prove

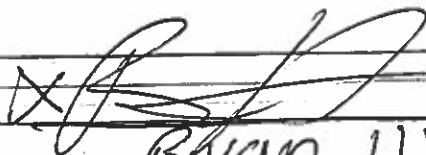
Againsts case is associated to 3:18cv03188 TMC TER

I hereby sign
swearing under penalty of
perjury the above complaint
is true

X 

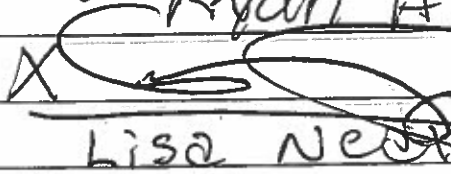
Bruce Hudson

3-14-2019

X 

Ryan Hill

3-1-19

X 

Lisa Neer

3-1-19

Re signed on below



Bruce Hudson

4-1-19